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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF CALIFORNIA
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13 **SAFARI CLUB INTERNATIONAL, et al.,**
14 Plaintiffs,
15
16 **v.**
17 **ROB BONTA, in his official capacity as**
Attorney General of the State of California,
18 **et al.,**
19 Defendants.
20

2:22-cv-01395-DAD-JDP

**NOTICE OF MOTION AND MOTION
FOR AN ORDER CLARIFYING THE
PRELIMINARY INJUNCTION**

Date: July 2, 2024
Time: 1:30 p.m.
Dept: 4 (Hearing Via Zoom)
Judge: Hon. Dale A. Drozd
Trial Date: None set
Action Filed: August 5, 2022

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT ON July 2, 2024, at 1:30 p.m., in Courtroom 4, 15th Floor, of the Robert T. Matsui United States Courthouse located at 501 I Street, Sacramento, California 95814, or as soon thereafter as the matter may be heard, the Court will hear Defendant Rob Bonta's motion for an order clarifying the preliminary injunction. The motion is made pursuant to the Court's authority to clarify the scope of the preliminary injunction issued in this action on April 12, 2024, ECF No. 33. *See Connecticut Gen. Life Ins. Co. v. New Images of Beverly Hills*, 321 F.3d 878, 883 (9th Cir. 2003); *Alto v. Black*, 738 F.3d 1111, 1121-22 (9th Cir. 2013). The motion requests an order clarifying that the preliminary injunction enjoins the enforcement only of subdivision (a) of California Business and Professions Code section 22949.80.

The hearing will be held by Zoom only. Parties will receive a Zoom ID number and password for the hearing by email from Judge Drozd's Courtroom Deputy Pete Buzo (PBuzo@caed.uscourts.gov). Any other interested parties or members of the public may access the hearing telephonically by dialing 888-557-8511 and using access code 9683466, at the time of the hearing. Because several matters may be set for hearing on the same afternoon, the parties will be notified in advance of the hearing at what specific time the court anticipates calling their case so they can join the Zoom at that time.

This motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities, the Declaration of Gabrielle Boutin, the papers and pleadings on file in this action, and upon such matters as may be presented to the Court at the time of the hearing.

1 Dated: May 15, 2024

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 ANTHONY R. HAKL
5 Supervising Deputy Attorney General

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7 /s/ Gabrielle D. Boutin
8 GABRIELLE D. BOUTIN
9 Deputy Attorney General
10 *Attorneys for Defendant Attorney General*
11 *Rob Bonta, in his official capacity*

12 **MEET AND CONFER CERTIFICATION**

13 I, Gabrielle D. Boutin, certify that counsel for the parties have satisfied the meet and confer
14 requirement in section (C) of the Standing Order for Civil Cases. Between May 1 and May 14,
15 2024, Plaintiffs' and Defendants' counsel exchanged emails discussing their respective positions.
16 These communications included Defendant's counsel's explanation of their position and request
17 that Plaintiffs stipulate to the request made in this motion.

18
19 Date: May 15, 2024

/s/ Gabrielle D. Boutin

20 Gabrielle D. Boutin
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CERTIFICATE OF SERVICE

Case Name: **Safari Club International v.
Bonta**

No. **2:22-cv-01395-DAD-JDP**

I hereby certify that on May 15, 2024, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

NOTICE OF MOTION AND MOTION FOR AN ORDER CLARIFYING THE PRELIMINARY INJUNCTION

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on May 15, 2024, at Los Angeles, California.

Dora Mora
Declarant

Dora Mora
Signature